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10 *Attorneys for Defendants*  
11 *Zuffa, LLC and Dana White*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 MARK HUNT, an individual, ) Case No. 2:17-cv-00085-JAD-CWH  
15 Plaintiffs, )  
16 vs. )  
17 ZUFFA, LLC d/b/a ULTIMATE FIGHTING )  
18 CHAMPIONSHIP, a Nevada limited liability )  
19 Company; BROCK LESNAR, an individual; )  
20 and DANA WHITE, an individual; and DOES )  
21 1-50, inclusive, )  
22 Defendants. )  
23 )  
24 )  
25 )  
26 )  
27 )  
28 )

29 Defendants Zuffa, LLC and Dana White, through their undersigned counsel, hereby seek  
30 leave pursuant to LR 7-3(c) to file an enlarged Reply brief in support of their Motion to Dismiss  
31 Plaintiff's Supplemental Complaint Pursuant to Fed. R. Civ. P. 12(b)(6) (ECF No. 111).  
32 Undersigned counsel believes that Defendants will need no more than three extra pages to  
33 address all of the arguments presented in Plaintiff Mark Hunt's Opposition to the Motion (ECF  
34 No. 120). Accordingly, Defendants seek leave to file a 15-page Reply brief. The good cause for  
35 the requested enlargement is set forth below in the declaration of counsel.

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1  
**DECLARATION OF J. COLBY WILLIAMS**

2 I, J. COLBY WILLIAMS, declare as follows:

3 1. I am a partner in the law firm Campbell & Williams and one of the attorneys  
4 representing Defendants Zuffa, LLC and Dana White in the above-captioned matter.

5 2. I make this Declaration in support of Defendant Zuffa, LLC's and Dana White's  
6 Motion for Leave to File Reply Brief in Excess of Twelve Pages. I have personal knowledge of  
7 this matter and am competent to testify regarding the same if called upon to do so.

8 3. Defendants filed their Motion to Dismiss Plaintiff's Supplemental Complaint  
9 Pursuant to Fed. R. Civ. P. 12(b)(6) (the "Motion") (ECF No. 111) on March 23, 2018. Prior to  
10 Defendants' filing the Motion, the Court had issued an order granting the parties leave to file an  
11 enlarged Motion to Dismiss and enlarged Opposition thereto in order to address the new  
12 allegations contained in Plaintiff's Supplemental Complaint. (ECF No. 110.) The Motion is  
13 twenty-four pages long and seeks dismissal of nine causes of action contained in Plaintiff's  
14 Supplemental Complaint which is comprised of ten causes of action in total, including multiple  
15 federal and state RICO-related claims. Plaintiff filed his Opposition to the Motion (ECF No.  
16 120) on April 6, 2018. The Opposition raises a number of arguments in response to the Motion.  
17 Pursuant to a Stipulation approved by the Court (ECF No. 122), Defendants' Reply is currently  
18 due on April 20, 2018.

19 4. I have drafted the majority of the Reply. While the brief is still a work in progress,  
20 it appears we are going to need extra pages in order to properly address the arguments raised in  
21 Plaintiff's Opposition and the numerous cases cited therein. The complexity and numerosity of  
22 the elements underlying Plaintiff's multiple RICO claims and the legal authorities interpreting  
23 the same require significant treatment, thereby leaving inadequate space to address Plaintiff's  
24 multiple other causes of action.

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5. Though the Reply is incomplete, we believe we will need three extra pages over the twelve-page limit imposed by LR 7-3(b). The three pages are primarily required to address Plaintiff's new allegations that Zuffa engaged in the predicate act of witness retaliation in violation of 18 U.S.C. § 1513. Thus, we respectfully seek leave to file a Reply that will not exceed fifteen (15) pages, excluding the table of contents/authorities, certificate of service, and any index of exhibits.

6. I advised Plaintiff's counsel last week that we may need to seek leave to file an enlarged Reply brief, and he advised that Plaintiff had no objection to such a request.

7. I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

DATED this 16th day of April, 2018.

/s/ J. Colby Williams  
J. COLBY WILLIAMS

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that service of the foregoing **Defendants Zuffa, LLC's and Dana White's Motion for Leave to File Reply in Excess of Twelve Pages** was served on the 16th day of April, 2018 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ J. Colby Williams  
An employee of Campbell & Williams

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